



Hudson River Sloop Comments presented to NYS DEC on Title V and SEQRA.8.23.21

(3 minute version presented at 1 p.m Virtual meeting)

Danskammer Expansion Contradicts CLCPA: The proposal to build the Danskammer expansion is in direct contradiction to New York's urgently needed Climate Leadership and Community Protection Act (CLCPA) and the **principles of climate justice and equity**. Continued investment in fracked gas at Danskammer would lock us into prolonged reliance on fossil fuel, in violation of NY's climate commitment of a zero-emissions electric sector by 2040.

IPPC: Earlier this month the UN Intergovernmental Panel on Climate Change (IPPC) issued a Code Red Alert for Humanity. They said plainly: **Climate change is real; it is a rapidly worsening crisis, and it is caused by burning fossil fuel**

Methane: In May 2021, the **UN's Global Methane Assessment report** urged government leaders to take strong action. **"Cutting methane is the strongest lever we have to slow climate change over the next 25 years... The benefits of doing so far outweigh the cost" and "any expansion of natural gas infrastructure and usage is incompatible with keeping warming to 1.5° C."**

With regard to **Title V's focus on air quality**, the proposed facility would not only worsen emissions of methane, because it would run more than 70% of the time. Even with a better pollution control system, it will release more than 25 times the particulate matter and volatile organic compounds (VOC) and three times more NOx pollution to the surrounding, already pollution-burdened community, compared to the current peaker plant, which only runs about 5% of the year.

Economics: A recent Standard & Poor report stated that "with strong renewable mandates and carbon emissions pricing ... \$34 billion investments in new gas plant construction could.. become stranded assets.

Better alternatives exist: The Danskammer facility has grid connections that make it ideally suited for a bulk battery storage facility, which would promote round the clock reliability as a critical component of the NY's mandated transition to a renewable energy economy, with storage and efficiency.

With regard to the DEC's pending **SPDES Permit:** By utilizing an air-cooling system, there would be less impact on Hudson River ecology from the proposed facility than from the current

water-cooled peaker plant, but it is still a fool-hardy investment, located in a floodplain as we face future storm surges and sea-level rise -- one that is in direct contradiction to NYS CLCPA and the IPCC directive to stop burning fossil fuel -- period. The DEC should deny Danskammer's application for a Title V air permit.

More complete comments on DEC Title V and SEQRA

Contradicts CLCPA: The proposal to build the expanded Danskammer fracked-gas power plant is in direct contradiction to New York's Climate Leadership and Community Protection Act (CLCPA) and the principles of climate justice and equity. New York has only 19 years to transition to an emissions-free grid. Continued investment in fracked gas at Danskammer would lock us into prolonged reliance on fossil fuel, limiting our ability to meet NY's climate commitment of a zero-emissions electric sector by 2040. Allowing Danskammer to be built after we passed the nation's boldest climate law would set a dangerous precedent for the fossil fuel industry..

IPPC: Earlier this month the UN Intergovernmental Panel on Climate Change (IPPC) issued a Code Red Alert for Humanity. They said plainly: **Climate change is real; it is a rapidly worsening crisis and it is caused by burning fossil fuel**

Methane: This year the International Energy Agency reported that methane, a highly potent greenhouse gas, is a major contributor to global warming. In May 2021, the UN's Global Methane Assessment report urged government leaders to take strong action. **"Cutting methane is the strongest lever we have to slow climate change over the next 25 years... The benefits of doing so far outweigh the cost" and "any expansion of natural gas infrastructure and usage is incompatible with keeping warming to 1.5° C."** (Sections 4.1, 4.2 and 4.3)"

With **Title V's focus on air quality**, the proposed facility would not only worsen emissions of methane, but because it would run more than 70% of the time, even with a better pollution control system, it will release more than 25 times the particulate matter and volatile organic compounds (VOC) to the surrounding, already pollution-burdened community, and three times more NOx pollution, compared to the current peaker plant, which only runs about 5% of the year. Pollution and associated respiratory illnesses are already elevated in Newburgh and the surrounding area.

Economics: Standard & Poor released a report stating that "a review of markets with strong renewable mandates and carbon emissions pricing indicates much of the U.S. fleet of recently built natural gas generation could come under pressure.. that \$34 billion investments in new gas plant construction could become stranded assets.

Hydrogen is a false solution: An August 12 *NYT* article, “For Many, Hydrogen Is the Fuel of the Future. New Research Raises Doubts,” reported on a new study showing that so-called “blue” hydrogen (hydrogen produced using gas with carbon capture and storage) would actually produce more greenhouse gases than burning fracked gas by itself.

Better alternatives: The Danskammer facility has grid connections that make it ideally suited for a bulk battery storage facility, which would promote round the clock reliability as a critical component of the NYS-mandated transition to a renewable energy economy, with storage and efficiency.

A brief note on the pending **SPDES Permit:** By utilizing an air-cooling system, there would be less impact on Hudson River ecology from the proposed facility than from the current water-cooled peaker plant, but it is still a fool-hardy investment, located in a floodplain as we face future storm surges and sea-level rise -- one that is in direct contradiction to NYS CLCPA and the IPCC directive to stop burning fossil fuel -- period. The DEC should deny Danskammer’s application for a Title V air permit.

Clearwater’s Main Concerns:

The Problem

- *The proposed Danskammer plant is **incompatible with NYS Climate Law.*** The proposal to build the Danskammer fracked gas power plant is incompatible with New York’s climate law (the CLCPA) and climate justice and equity principles. NY has only 19 years to transition to an emissions-free grid. Continued investment in fracked gas at Danskammer would lock us into prolonged reliance on fracked gas power, limiting our ability to meet New York’s climate commitment of a zero-emissions electric sector by 2040. Allowing Danskammer to be built after we passed the nation’s boldest climate law would set a dangerous precedent for NY and tell the fracked gas industry that they can continue building out climate-destroying infrastructure in our state.
- *The proposed Danskammer plant will **increase air pollution and threaten public health.*** The new plant would run far more often than the current plant and could add over 25 times more health-damaging particulate matter and volatile organic compounds (VOC) to our region, and three times more NOx pollution, compared to the current Danskammer peaker plant. Pollution and associated respiratory illnesses are already elevated in Newburgh and the surrounding area.
- *The proposed Danskammer plant is **an unnecessary risk.*** Recent reports on the reliability of New York State’s grid do not show any need at all for a new fracked gas plant in the Hudson Valley. The authorities that monitor New York State’s grid have long planned for the retirement of Indian Point, and those plans do not include the new Danskammer plant. Better alternative uses -- mainly energy storage -- exist for that site that will support the transition to a clean energy economy.

Solutions/Call to Action

The Department of Environmental Conservation must reject Danskammer's proposal and make it clear that they will not approve any new fracked gas power plants.

This action would protect frontline communities in the City of Newburgh who already suffer disproportionately from pollution and would be exposed to even more pollution by building a new fracked gas power plant.

This action would send a clear message to the energy industry that it is time to invest in clean energy solutions like wind, solar and battery storage, NOT new fossil fuel plants. The clean energy industry is set to create thousands more good-paying jobs than these new fossil fuel plants would.

Blocking Danskammer and all fracked gas power plants is a critical step in implementing the Climate Leadership and Community Protection Act, meeting our climate goals, and protecting all New Yorkers from the dangerous impacts of climate change.

A new Danskammer is inconsistent with NY state climate law- the Climate Leadership & Community Protection Act.

Many comments made recently pointed to the August 2021 IPCC report, which has explicit instructions for government leaders and implications for DEC on Danskammer. We'd like to point to additional reports that have come out this year that highlight methane specifically. Natural gas emits methane into the atmosphere at each step needed for its usage--extraction, storage, transportation, and burning. According to an analysis by the International Energy Agency in 2021, methane is a much more potent greenhouse gas than carbon dioxide (CO2) and is a major contributor to global warming. Additionally, the Global Methane Assessment, a landmark report released in May 2021 from the United Nations Environment Programme and leading experts, urges government leaders to take action. "Cutting methane is the strongest lever we have to slow climate change over the next 25 years and complements necessary efforts to reduce carbon dioxide. The benefits to society, economies, and the environment are numerous and far outweigh the cost", said Inger Andersen, the UNEP Executive Director. The report found that "any expansion of natural gas infrastructure and usage is incompatible with keeping warming to 1.5° C. (Sections 4.1, 4.2 and 4.3)"

A 45 percent reduction in methane would prevent 260,000 [premature deaths](#), 775 000 asthma-related hospital visits, 73 billion hours of lost labor from extreme heat, and 25 million tons of crop losses annually. The UN methane report research team- including scientists at the Stockholm Environment Institute (SEI) at the University of York, outlines what leaders need to do. The IPCC report has guidelines as well. It is time for us to take heed of the expertise of hundreds of scientists. No pandering to corporate interests; both the environmental and economic costs outweigh the benefits.

To the DEC, our decision- makers here -- how does a new Danskammer rate when taking all of these reports and findings into account? We ask that you push away the distractions. The hydrogen pipedream is a false solution. The economic advantage for a small select few (which

sacrifices clean air and public health). Please cast this aside for today and focus on what Danskammer is ACTUALLY proposing and its blatant deviation from our state climate law.

The global consensus shows that we must transition off of fossil fuels, not increase our dependence on them. We have an innovative state climate policy that asserts the same. Please deny Danskammer's Title V air permit. Thank you for holding the public hearings this week. We appreciate the time and effort you're putting into the process.

From Susan Gillespie's Letter of August 14, 2021, which Clearwater agrees with

During the week of August 8, two reports came out with good news for opponents of repowering Danskammer – and bad news for all of us if the project is allowed to proceed with plans to provide baseload electricity by burning natural gas or, later, hydrogen. Based on new studies, neither of these methods will meet New York's climate goals or help salvage our civilization in the face of accelerating climate change. Neither are likely to be profitable, meaning that once again ratepayers could get stuck with the bill.

First, Standard & Poor released a report stating that “a review of markets with strong renewable mandates and carbon emissions pricing indicates much of the U.S. fleet of recently built natural gas generation could come under pressure.... Market Intelligence estimates that \$34 billion in coal plant investment and another \$34 billion in new gas plant construction could be at risk.”¹

Second, an August 12 *NYT* article, headlined “For Many, Hydrogen Is the Fuel of the Future. New Research Raises Doubts,” reported on a new study showing that so-called “blue” hydrogen (hydrogen produced using gas with carbon capture and storage) would actually produce more greenhouse gases than burning fracked gas by itself.

There are plenty of other reasons to oppose the repowering plan, including the extreme environmental damage to which the people of Newburgh have already been subjected through PFOS contamination. The new projections should convince the Public Service Commission, which has the final say on the project and is expected to rule soon, that the project is neither fair nor reasonable. The owners of the Danskammer plant – NYC-based Tiger Funds – would do well to head them as well.

¹ [1] FINANCIAL FOCUS A nationwide push for green energy could strand \$68B in coal, gas assets Thursday, August 5, 2021 8:31 AM ET By Adam Wilson and Steve Piper Market Intelligence. Available at https://cdn.roxhillmedia.com/production/email/attachment/880001_890000/6c9c2b7774f900a0df3eaf4a0a4fb8c42519f749.pdf

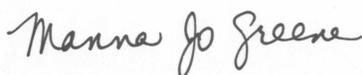
Stop Danskammer Coalition, which Clearwater is a member of.

- INCREASE AIR POLLUTION & THREATEN OUR HEALTH. A new Danskammer could add over 25 times more health-damaging particulate matter and volatile organic compounds (VOC) to our region. The pollution could contaminate our agricultural lands, negatively impact tourism, and exacerbate respiratory illnesses, which are already elevated in Newburgh and the surrounding area.
- WORSEN THE CLIMATE CRISIS. A new Danskammer would increase the region's fossil fuel dependency and would emit up to 40 times more greenhouse gases at a time when NY state is supposed to be reducing greenhouse gases by 85% by the year 2050.
- HARM PEOPLE OF COLOR AND LOW-INCOME COMMUNITIES. The new Danskammer would add to the pre-existing environmental racism in Newburgh, a city already struggling with PFO/PFA drinking water contamination from Stewart Air National Guard Base.
- BE AN UNNECESSARY RISK. A new Danskammer is not needed as a power source even with Indian Point closing, as New York State continues to rapidly increase its renewable energy portfolio with storage and energy efficiency measures.
- POTENTIALLY FLOOD. A new Danskammer would be constructed on a known floodplain which was severely flooded less than a decade ago by Hurricane Sandy--and damaged the existing power plant to the extent it was slated to be sold for scrap.
- BE A STEP BACKWARD. A new Danskammer plant would need to be phased out no later than 2040 (per the NY's state energy policy- the Climate Leadership & Community Protection Act), and likely sooner. If built, it will very likely be a stranded asset- the plant owners will declare bankruptcy and the surrounding community will be left holding the bag.

See also:

[Global Methane Assessment: Benefits and Costs of Mitigating Methane Emissions](#)

Many thanks,



Manna Jo Greene, Environmental Action Director
Hudson River Sloop Clearwater, Inc.